

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

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SNMP RESEARCH, INC. and SNMP	:	Case No. 3:20-cv-00451-CEA-DCP
RESEARCH INTERNATIONAL, INC.,	:	
	:	
Plaintiffs,	:	U.S. District Judge Charles E. Atchley, Jr.
	:	
v.	:	
	:	
BROADCOM INC.; BROCADE	:	
COMMUNICATIONS SYSTEMS LLC; and	:	
EXTREME NETWORKS, INC.,	:	
	:	
Defendants.	:	
	:	
	X	

**EXTREME NETWORKS, INC.'S MOTION TO COMPEL THE
PRODUCTION OF LICENSE AGREEMENTS FROM SNMP RESEARCH, INC.
AND SNMP RESEARCH INTERNATIONAL, INC.**

Pursuant to Federal Rules of Civil Procedure 34 and 37(a) and Local Rule 37.2, Extreme Networks, Inc. ("Extreme") hereby respectfully moves this Court for an Order compelling SNMP Research, Inc. and SNMP Research International, Inc. (together, "SNMPR") to produce the license agreements requested by Extreme.

As set forth in the accompanying Memorandum of Law, and supported by the exhibits filed herewith, Extreme seeks copies of SNMPR's license agreements through two of the six total requests for production that Extreme served on SNMPR nearly one year ago. In response, SNMPR has produced what it describes as a fraction of its full licensing history, and has explicitly stated that it is withholding hundreds of agreements, for which action SNMPR has not provided satisfactory justification. Extreme has attempted to resolve this issue outside of court, and pursuant

to Federal Rule of Civil Procedure 37(a) the undersigned certify that they have conferred in good faith with counsel for SNMPR. The evidence requested by Extreme is relevant to the claims in this case and to rebut defenses likely to be asserted by SNMPR, is proportional to the needs of the case, and should be produced immediately.

WHEREFORE, Extreme respectfully requests that this Court grant its Motion and compel SNMPR to produce the license agreements requested by Extreme.

DATED: May 11, 2022
New York, New York

Respectfully Submitted,

/s/ Leslie A. Demers

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